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U.S. BANKRUPTCY COURT  
DISTRICT OF DELAWARE

Tom L. Lewis  
Lewis & Slovak, P.C.  
P. O. Box 2325  
Great Falls, MT 59403  
(406) 761-5595

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
W.R. GRACE & CO., <u>et al</u>	)	Case No. 01-01139 (JKF)
	)	(Jointly Administered)
Debtors.	)	
	)	Claim No. 00005561
	)	
	)	

**RESPONSE TO DEBTORS' SECOND OMNIBUS  
OBJECTION TO CLAIMS (NON-SUBSTANTIVE)**


On behalf of claimant, Rodney Elletson (Claim No. 00005561), his attorney, Tom L. Lewis of Lewis & Slovak, P.C., objects to Debtors' Second Omnibus Objection to Claims (Non-Substantive), dated July 21, 2003, and received August 7, 2003, on the basis of improper notice and further responds as follows:

1. Claimant's claim is with respect to asbestos contamination from a Grace product in or on the property.
2. Claimant's claim is based upon the findings of the U.S. Environmental Protection Agency in its Administrative Record and supplement, test results, and other documentation, as well as information obtained from other sources, including but not limited to local and national news reports, articles and meetings.
3. Claimant consented to the production and release of supporting documentation, in the possession of the U.S. Environmental Protection Agency, to Grace and Grace's representatives at the time of submission of claim in March, 2003.
4. Claimant will supplement his response when the test results are made available to him.

**RESPONSE TO DEBTORS' SECOND OMNIBUS  
OBJECTION TO CLAIMS (NON-SUBSTANTIVE) - 1**

Respectfully submitted this 8th day of August, 2003.

Lewis & Slovak, P.C.

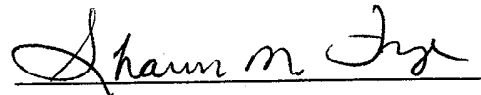
By:   
\_\_\_\_\_  
Tom L. Lewis  
P.O. Box 2325  
Great Falls, MT 59403  
(Attorneys for Claimant)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and legible copy of the foregoing Response to Debtors' Second Omnibus Objection to Claims (Non-Substantive) was served on the 8th day of August, 2003, by fax and by first class mail, upon the following:

James W. Kapp III, Janet S. Baer and Christian J. Lane  
Kirkland & Ellis, LLP  
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Scott E. McFarland  
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\_\_\_\_\_  
Shaun M. Iyer